

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

IVETTE M. MARTINEZ GONZALEZ, ET
AL.,

Plaintiffs,

v.

CIVIL No. 16–2077 (GAG-BJM)

CATHOLIC SCHOOLS OF THE AR-
CHDIOCESES OF SAN JUAN PENSION
PLAN, ET AL.,

Defendants.

Final Motion for Extension of Time to Respond to Motion to Compel

To The Honorable Court:

Defendants Catholic Schools of the Archdioceses of San Juan Pension Plan and the Superintendence of Catholic Schools of the Archdioceses of San Juan respectfully move this Court to grant them a final extension of time, until August 31, 2017, to oppose the plaintiffs' motion to compel.

The short of it that the undersigned will need more than time than he had expected — no least because of its length, *see* ECF No. 132 — to responsibly respond to the plaintiffs' motion to compel. (This may include a potential last-ditch good-faith attempt to resolve any disputes without this Court's intervention.) The requested extension in no way would affect the discovery schedule ordered by this Court at ECF No. 113. And, in fact,

one of the reasons why the undersigned will need more time to oppose the motion to compel is that he had been preparing for today's depositions of Mr. Francis M. Ouellette and Mrs. Anabel P. Casey. *See id.* ("Depositions are scheduled for the week of 8/21/17"). Last but not least, the undersigned has been relocating to a new office, a move that naturally (but temporarily) slows an attorney's workflow.

For these reasons, and because the defendants have shown good for a last extension of time, they respectfully request that this Court *grant* this motion and thus give them until August 31, 2017 within which to respond to the plaintiffs' motion to compel.

Dated: August 21, 2017

Respectfully submitted,

SBGB LLC

Attorneys for Catholic Schools of the Archdioceses of San Juan Pension Plan and the Superintendence of Catholic Schools of the Archdioceses of San Juan

Corporate Center Building | Suite 202
33 Calle Resolución
San Juan, PR 00920
Tel. (787) 487-6006

/s/ JAIME L. SANABRIA MONTAÑEZ
USDC-PR 225307
jsanabria@sbgblaw.com

CERTIFICATE OF SERVICE

I certify that, on this day, the foregoing was electronically filed with the Clerk of Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

By: /s/ Jaime L. Sanabria Montañez